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REMARKS/ARGUMENTS

Claims 1-13 and 18-21 are pending in this application. By this Amendment, Applicants AMEND claims 1 and 13 and CANCEL claims 14-17.

Applicants' counsel greatly appreciates the courtesies extended by the Examiner in the telephone interview of September 13, 2005. Applicants' counsel explained how the amended features are not taught or suggested by Arai et al.

Applicants greatly appreciate the Examiner's indication that claims 4-6, 10, 11, 19, and 21 would be allowable if rewritten in independent form including all of the features of the base claim and any intervening claims.

Applicants affirm election of Group I, including claims 1-13 and 18-21. Applicants have canceled claims 14-17 since this group of claims was not elected. Further, Applicants reserve the right to file a Divisional Application to pursue prosecution and allowance claims 14-17.

The Examiner rejected claims 1-3, 7-9, 12, 13, 18, and 20 under 35 U.S.C. 103(a) as being unpatentable over Arai et al. (U.S. 5,291,065). Applicants respectfully traverse the rejection of claims 1-3, 7-9, 12, 13, 18, and 20.

Claim 1 has been amended to recite:

An electronic substrate to mount a plurality of semiconductor chips thereon, the substrate comprising:

a first conductive member, which is electrically connected to one of the semiconductor chips;

a second conductive member, which is electrically connected to another one of the semiconductor chips; and

an insulating layer for electrically isolating the second conductive member from the first conductive member; wherein

the first conductive member is a conductive base that supports the insulating layer, the semiconductor chips and the second conductive member thereon;

a connector extends through the insulating layer; and

a first power supply electrode is provided on the insulating layer and is electrically connected to the conductive base by said connector. (emphasis added)

Applicants' claim 1 recites the features of "the first conductive member is a conductive base," "a connector extends through the insulating layer," and "a first power

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supply electrode is provided on the insulating layer and is electrically connected to the conductive base by said connector."

Applicants' claim 13 recites features similar to the above emphasized features.

The Examiner alleged in the third and fourth paragraphs on page 2 of the outstanding Office Action that reference number 320 of Arai et al. teaches the feature of an insulating layer as recited in Applicants' claims 1 and 13 and that reference number 310C of Arai et al. teaches the feature of a first conductive member that is a conductive base as recited in Applicants' claims 1 and 13.

However, Arai et al. clearly fails to teach or suggest that a connector extends through the insulating layer 310 to electrically connect the conductive base 310C to a power supply electrode. Further, Arai et al. teaches the use of external aluminum wires 5g, 314, and 315, NOT the use of a connector that extends through an insulating layer as recited in Applicants' claims 1 and 13.

Thus, Applicants' respectfully submit that Arai et al. fails to teach the features of "a connector extends through the insulating layer" and "a first power supply electrode is provided on the insulating layer and is electrically connected to the conductive base by said connector" as recited in Applicants' claim 1 and similarly in Applicants' claim 13.

Claim 18 recites:

An electronic substrate to mount a plurality of semiconductor chips thereon, the substrate comprising:

a first conductive member, which is electrically connected to one of the semiconductor chips;

a second conductive member, which is electrically connected to another one of the semiconductor chips;

an insulating layer for electrically isolating the second conductive member from the first conductive member; and

a conductive base that supports the first and second conductive members, the insulating layer and the semiconductor chips thereon; wherein

the second conductive member is a conductive plate, which is large enough to mount at least one of the semiconductor chips thereon; and

the conductive plate is supported on the conductive base so as to cover at least a portion of the first conductive member.
(emphasis added)

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Applicants' claim 18 recites the features of "a conductive base that supports the first and second conductive members, the insulating layer and the semiconductor chips thereon," "the second conductive member is a conductive plate, which is large enough to mount at least one of the semiconductor chips thereon," and "the conductive plate is supported on the conductive base so as to cover at least a portion of the first conductive member."

As noted above, the Examiner alleged in the third paragraph on page 2 of the outstanding Office Action that reference number 310C of Arai et al. teaches the feature of a first conductive member that is a conductive base as recited in Applicants' claims 1 and 13.

However, in Applicants' claim 18, the first conductive member and the conductive base are distinct elements because claim 18 requires that the conductive base support the first conductive member. Thus, Applicants respectfully submit that reference number 310C does not teach or suggest both the first conductive member and the conductive base as recited in Applicants' claim 18. Further, Applicants respectfully submit that Arai et al. fails to teach or suggest the feature of "a conductive base that supports the first and second conductive members, the insulating layer and the semiconductor chips thereon" as recited in Applicants' claim 18.

The Examiner alleged in the third paragraph on page 2 of the outstanding Office Action that reference number 310C of Arai et al. teaches the feature of a first conductive member as recited in Applicants' claim 18 and that reference number 330 of Arai et al. teaches the feature of a second conductive member as recited in Applicants' claim 18.

Applicants' claim 18 requires that the second conductive member is a conductive plate that covers at least a portion of the first conductive portion. However, Arai et al. teaches that reference number 330 of Arai et al. covers no portion of the reference number 310C of Arai et al. as clearly seen in, for example, in **Figs. 1, 3, and 4**.

Thus, Applicants respectfully submit that Arai et al. fails to teach or suggest the features of "the second conductive member is a conductive plate, which is large enough to mount at least one of the semiconductor chips thereon" and "the conductive plate is supported on the conductive base so as to cover at least a portion of the first conductive

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member" as recited in Applicants' claim 18.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 1, 13, and 18 under 35 U.S.C. 103(a) as being unpatentable over Arai et al.

Accordingly, Applicants respectfully submit that the prior art of record, applied alone or in combination, fails to teach or suggest the unique combination and arrangement of elements recited in claims 1, 13, and 18 of the present application.

Claims 2-12 and 19-21 depend upon claims 1 and 18 and are therefore allowable for at least the reasons that claims 1 and 18 are allowable.

In view of the foregoing amendments and remarks, Applicants respectfully submit that this application is in condition for allowance. Favorable consideration and prompt allowance are solicited.

The Commissioner is authorized to charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1353.

Respectfully submitted,



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